

**Emission Reporting Rule Applicability**

Office of Air Quality

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Following are answers to frequently asked questions concerning the Emission Reporting Rule at Title 326, Article 2, Rule 6 of the Indiana Administrative Code (326 IAC 2-6). View the rule at: [iac.iga.in.gov/iac/T03260/A00020.PDF?](http://iac.iga.in.gov/iac/T03260/A00020.PDF?).

**Q. Do I have to report?**

A. You will only report regularly if you are a Title V source, a source that emits 25 tons or more of volatile organic compounds (VOC) or oxides of nitrogen (NO<sub>x</sub>) in Clark, Floyd, Lake, or Porter counties, or a source that emits 5 tons or more of lead. See Section 1 of 326 IAC 2-6 concerning applicability.

**Q. How often will I have to report?**

A. Sources located in Clark, Floyd, Lake, and Porter counties will continue reporting annually. The rest of the sources in the state will have to report annually only if they have the potential-to-emit 250 tons or more per year of VOC or particulate matter less than or equal to 10 micrometers (PM<sub>10</sub>), or 2,500 tons or more per year of carbon monoxide (CO), NO<sub>x</sub>, or sulfur dioxide (SO<sub>2</sub>). The rest of the sources will have to report the previous year's emissions data once every three years. See Section 3 of 326 IAC 2-6 concerning compliance schedules.

**Q. When will I have to report?**

A. Emission Statements are required by July 1<sup>st</sup>. See Section 3 of 326 IAC 2-6 concerning compliance schedules.

**Q. Do I have to report this year?**

A. Smaller sources located in Clark, Floyd, Lake, or Porter counties will have to report every year that they actually emit 25 tons or more of VOC or NO<sub>x</sub>. The rest of the sources will only have to report annually if they have the potential to emit 250 tons or more per year of VOC or PM<sub>10</sub>, or 2,500 tons per year of CO, NO<sub>x</sub>, or SO<sub>2</sub>. If you are in the second category, you MAY not have to report this year if you have submitted to the Indiana Department of Environmental Management (IDEM) the Administrative Permit Amendment or Notice Only Change. See Section 3 of 326 IAC 2-6 for the reporting schedule.

**Q. My source does not have a Part 70 Permit, it is *not* located in Clark, Floyd, Lake, or Porter counties, and I have submitted for the change to the permit (if necessary). Do I have to report last year's emissions?**

A. No. As long as IDEM has received the change to your permit, we do not expect to receive an Emission Statement from you.

**Q. My source does not have a Part 70 Permit, it *is* located in Clark, Floyd, Lake, or Porter counties, and I have submitted for the change to the permit (if necessary). Do I have to report last year's emissions?**

A. Only if you have a Part 70 permit or have emitted 25 tons or more of VOC or NO<sub>x</sub>. If you have a Part 70 permit, please refer to Section 4 of the rule for the reporting schedule. You may not be required to report annually.

**Q. I am filling out the State Form 51665 (3-04), but what do I put in the box asking to identify the emission reporting requirement?**

A. Just list where the Emission Statement requirement is located in your permit (a paragraph in Section C in most permits).

**Q. How do I determine my Potential to Emit?**

A. Your Potential to Emit should be in your final permit or in your permit application. One place to look would be in the technical support document.

**Q. What if my source has taken an enforceable limit in the permit?**

A. The effect of those limits should be included in your determination of Potential to Emit for your facility. For instance, your Title V facility does surface coating and has taken a limit on the amount of product coated in a 12-month period to ensure that your source does not exceed 250 tons of VOC. Your facility would fall under triennial reporting, not annual reporting.

**Q. Are there any new requirements?**

A. Yes. To address changes in United States Environmental Protection Agency's (U.S. EPA's) reporting rules, IDEM has added a few requirements. Some of the new requirements also reflect changes in recordkeeping. An example is that the federal government has stopped using the Standard Industrial Classification (SIC) code and is now using the North American Industrial Classification System (NAICS). Other reportable items include:

1. Design Capacity.
2. Maximum Nameplate Capacity.
3. Stack Parameters.
4. VOC or PM<sub>10</sub> emissions must be reported as a total.
5. Sulfur, Ash, and Heat content are now required to be reported if they are used in the emissions calculation.
6. The Emission Statement must now be certified by the responsible official.

**Q. Do I have to report hazardous air pollutants (HAPs)?**

A. Not on a regular basis. The rule does allow for IDEM to request this information but reporting HAPs was not made a regular reporting requirement. Title V permits still require that sources pay for "billable" HAPs. Those are HAPs that have been determined to not be PM<sub>10</sub> or VOC (see the certification letter for the list of billable HAPs). See Sections 4 and 5 of 326 IAC 2-6 concerning requirements and additional information requests.

**Q. When would I have to report HAPs?**

A. Only when requested by IDEM, not on a regular basis. The rule allows IDEM to require that this information be reported when it is to be used to study an area or an industry, to develop state implementation plans, to address public complaints, to better develop modeling inventories, to reply to information requests, and to verify Toxic Release Inventory information. See Section 5 of 326 IAC 2-6 concerning additional information requests.

**Q. How will the changes affect the Title V (Part 70) billing?**

A. For Title V sources reporting annually, the changes will not impact how the bills are calculated. For Title V sources that will report once every three years, the Emission Statement will be used to calculate their bills for three years, until they report again. In the interim years, however, a source can provide information that emissions have changed. For example, a source could dispute their bill and provide an updated Emission Statement if emissions have decreased. Conversely, IDEM can request additional emissions information for billing purposes if it has reason to believe emissions have increased.

**More Information:**

- View information concerning Emissions Reporting and Inventories at: [www.in.gov/idem/airquality/reporting/](http://www.in.gov/idem/airquality/reporting/).
- Contact the Office of Air Quality at (317) 233-0178 or (800) 451-6027 option 4.